

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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☒ Mark Vincent

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Socorro Alejandro PALACIOS

Case: 2:23-ntj-30122

Assigned To : Unassigned

Assign. Date : 3/25/2023

Description: COMP USA V Palacios (kent)

## CRIMINAL COMPLAINT


I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 25th, 2023 in the county of St. Clair in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*Title 8, United States Code, Section 1324(a)(1)(A)  
(ii)

Bringing in and Harboring Certain Aliens

This criminal complaint is based on these facts:

On or about March 25, 2023, in the Eastern District of Michigan, Southern Division, Socorro Alejandro PALACIOS, a United States citizen, did knowingly or in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport or move such alien within the United States by means of transportation or otherwise, in furtherance of violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: March 25, 2023City and state: Flint, Michigan
  
 Complainant's signature

Mark I. Vincent, Border Patrol Agent

Printed name and title

  
 Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Mark I. Vincent, declare the following under penalty of perjury:

1. I, Mark Vincent, am a Border Patrol Agent (BPA) with the United States Border Patrol and have been since December 14, 2009. As a U.S. Border Patrol Agent, I am tasked with detecting, preventing, and apprehending undocumented aliens, smugglers of aliens, and illegal narcotics by maintaining surveillance and/or patrolling the international border with the United States and Canada.
2. I make this affidavit in support of a finding of probable cause that, on March 25, 2023, Defendant Socorro Alejandro PALACIOS committed violations of Title 8 U.S.C. § 1324(a)(1)(A)(ii) (relating to knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law). This affidavit is based upon my personal knowledge, information provided by other law enforcement officers, and record checks of law enforcement and Department of Homeland Security databases. This affidavit may not contain all the information gathered during the investigation of this incident.
3. On March 05, 2022, PALACIOS was arrested by the Norton Shores Police Department in Michigan. PALACIOS was charged with (Operating With A High BAC).
4. On January 01, 2023, PALACIOS was convicted in the 60<sup>th</sup> District Court for (Operating With A High BAC). PALACIOS was fined \$1100.00 and received 6 months probation.
5. On or about March 25, 2023, Border Patrol Agents from the Marysville Border Patrol Station were patrolling in and around Harsens Island, located in Clay Township, Michigan, due to recent smuggling activity in this area. Harsens Island is located along the St. Clair River, which also serves as the international border between the United States and Canada.
6. At approximately 3:38 a.m., KAK700 (Detroit Sector Border Patrol Dispatch) received a call from the Clay Township Police dispatch regarding a call from a local concerned citizen who owns a residence on Harsens

Island. The citizen stated he had just received a call from a female who spoke broken English requesting if one of his rental properties was available for immediate occupancy. The female stated that she was on North Channel Dr., on Harsens Island and needed a room immediately. The citizen told the unknown female that he was not renting properties this early in the morning and hung up on the female. This information was relayed to agents in the field.

7. Marysville Border Patrol Agents Jason R. Bayliss and Jerry Curley along with a Clay Twp. Police Officer boarded the Harsens Island car ferry to embark onto Harsens Island to investigate. While entering onto the ferry, BPA Jerry Curley, observed a white sedan, (MI/5PGF93), being driven by male subject, pull in directly behind BPA Bayliss. Record checks on the white sedan revealed the vehicle, a 2013 Dodge Avenger registered to a female, out of Ypsilanti, Michigan. It should be noted that Ypsilanti, Michigan is approximately 80 miles away and over an hour drive from Harsens Island, Michigan.
8. Once the ferry made landfall on Harsens Island, BPAs Curley and Bayliss maintained surveillance of the white sedan. KAK700 was able to assume observation of the white sedan utilizing Remote Video Surveillance System (RVSS) cameras while it sat near the intersection of N. Channel Dr., and Orchid Blvd. BPA Bayliss continued to observe the vehicle from a distance in a driveway on Orchid Blvd.
9. At approximately 4:20 a.m., RVSS cameras observed three subjects come from the area of 435 Orchid Blvd., run toward, and enter the white sedan. The suspect vehicle departed and made its way back toward and onto the ferry to the mainland. BPAs Bayliss and Curley along with Clay PD also boarded the ferry. Once the ferry pulled away from Harsens Island, BPA Bayliss requested another marked Clay Twp unit along with another marked and unmarked Border Patrol unit to wait on the mainland for the suspect vehicle to exit the ferry.
10. Once the ferry reached the mainland, the marked Clay Twp. unit and Border Patrol units activated their emergency equipment to conduct a vehicle stop of the white sedan. BPAs Curley and Joshua Turner approached the suspect vehicle and identified themselves as Border Patrol agents and initiated an immigration field interview. BPAs Bayliss and Misner were also on scene.

11. The driver was identified as Socorro Alejandro PALACIOS. All subjects in the vehicle were questioned as to their citizenship and places of birth. Socorro Alejandro PALACIOS, claimed to be a United States Citizen and that he was born in Lansing, Michigan. All three of PALACIOS' passengers freely admitted to being in the United States illegally without any immigration documents or petitions filed on their behalf. All three passengers also admitted to crossing the U.S./Canadian Border the night before, on 03/24/2023 in the evening by crossing the St. Clair River by boat. All three passengers were administratively arrested under the Immigration and Nationality Act, as amended. PALACIOS was arrested upon probable cause of violating 8 U.S.C. §1324(a)(1)(A)(ii) (relating to the unlawful transportation of aliens within the United States).
12. During an interview at the Marysville Border Patrol station, PALACIOS was advised of his Miranda Rights and agreed to answer questions. PALACIOS admitted that he agreed to pick up two individuals on Harsens Island and transport them to the Lansing, Michigan area for the sum of \$500.00 United States dollars. PALACIO stated that he was not initially aware that there would be a third individual to transport.
13. Based on the above information, I believe there is probable cause that Socorro Alejandro PALACIOS, a United States Citizen, knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transported, or moved or attempted to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law on March 25, 2023, at or near Clay Township, Michigan, in violation of 8 U.S.C. §1324(a)(1)(A)(ii).



Mark I. Vincent, Border Patrol Agent  
U.S. Department of Homeland Security

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



Honorable Curtis Ivy, Jr.  
United States Magistrate Judge

March 25, 2023